

### **REMARKS**

This paper is being provided in response to the Office Action dated April 8, 2008, for the above-referenced application. In this response, Applicants have amended claims 1-10 and added new claims 11-25 to clarify that which Applicants consider to be the presently-claimed invention. Applicants note that claims 7 and 10 have been rewritten into independent form. Applicants respectfully submit that the amendments to the claims and the new claims are fully supported by the originally-filed specification. Further, Applicants have amended the specification and drawings for purposes of clarification. Applicants respectfully submit that the amendments to the specification and drawings do not add new subject matter.

The rejection of claims 1-4, 7 and 8 under 35 U.S.C. 103(a) as being unpatentable over JP 2003273980 to Kuno, et al. (a computer-generated English translation of which, submitted herewith, is hereinafter referred to as Kuno) in view of U.S. Patent No. 6,724,375 to Wu, et al. (hereinafter "Wu") is hereby traversed and reconsideration is respectfully requested in view of the amendments to the claims contained herein. As noted above, for the convenience of the Examiner and to further the discussion of the Kuno reference herein, Applicants have attached hereto a computer-generated English translation of the Kuno reference obtained from the Japanese Patent Office web site.

Independent claim 1, as amended herein recites, an external apparatus for mobile communication terminal including detection means for detecting at least one of position, direction, attitude and movement of said external apparatus along at least one axis of a coordinate system. Data transmission means transmits detection result data acquired based on

detection results by said detection means to said mobile communication terminal by wired or wireless non-public short-range communication. Claims 2-6 and new claim 15 depend directly or indirectly from independent claim 1.

Independent claim 7, as amended herein, recites a mobile communication terminal including application program execution means for executing an application program with detection result data acquired based on detection results by detection means for detecting at least one of position, direction, attitude and movement, in a main body of said mobile communication terminal. An external apparatus for mobile communication terminal is provided that includes the detection means for detecting the at least one of position, direction, attitude and movement of said external apparatus along at least one axis of a coordinate system; and data transmission means for transmitting detection result data acquired based on detection results by said detection means to said mobile communication terminal by wired or wireless non-public short-range communication. The mobile communication terminal further includes data reception means for receiving detection result data transmitted from said external apparatus for mobile communication terminal by wired or wireless non-public short-range communication, in the main body of said mobile communication terminal. The application program execution means executes said application program with detection result data received by said data reception means. Claims 8, 9 and new claims 14 and 16 depend directly or indirectly from independent claim 7.

The Kuno reference discloses a game controller for a mobile phone. The Office Action cites to Figure 6, and specifically a game controller 30 and the first portion 31 and the second portion 32 that are shown insertable in the game controller 30. The first portion 31 is illustrated

as including a directional pad and the second portion 32 is illustrated as including buttons. (See, for example, paragraphs 0031-0037 and Figures 6 and 7 of Kuno.

The Wu reference discloses a hand writing input device for cellular phone. The input device may be a digital tablet for use with a cellular phone. The Office Action cites to Wu as disclosing data reception means of a mobile communication terminal by wired or wireless communication, citing specifically to col. 2, lines 55-53 of Wu.

Applicants' independent claims have been amended herein to clarify that a detection means detects at least one of position, direction, attitude and movement of the external apparatus along at least one axis of a coordinate system. That is, for example, as discussed by Applicants in the originally-filed specification, the detection means (or sensor device) includes a acceleration sensor and/or a geomagnetic sensor for detecting acceleration and/or angle orientation, pitch, roll etc.. of the external apparatus itself (and by its attachment to the mobile communication terminal, the acceleration and/or angle orientation of the mobile communication terminal). (See, for example, page 21, line 8 to page 22, line 9 of the originally-filed specification). As discussed by Applicants, the detected movement of the mobile phone using the detection means may be used to generate detection result data that is transmitted for use by a processor and/or other application execution means in the execution of an application (e.g., mouse application program, flight simulator). (See, for example, pages 23 and 36 of the originally-filed specification.)

In contrast, Kuno discloses a game controller (30) that includes a directional pad device (31) and button device (32) that are attached to a cellular phone to control a game played on the

cellular phone. Kuno's directional pad and button devices do not sense movement of the cellular phone, rather the user depresses the directional pad and/or buttons to cause an action that is shown on the cellular phone display. Applicant respectfully submits that the directional pad and button devices of Kuno's system do not teach or fairly suggest at least the features of detection means for detecting at least one of position, direction, attitude and movement of the external apparatus along at least one axis of a coordinate system, as recited by Applicants.

Further, Applicants respectfully submit that Wu does not overcome the above-noted deficiencies of Kuno with respect to Applicants' presently-claimed invention. Specifically, Wu discloses a digital table attached to a cellular phone; however, like Kuno, Wu's input device does not sense movement of a cellular phone but rather monitors a user's input (i.e. writing on the digital table). Accordingly, Applicants respectfully submit that neither Kuno nor Wu, taken alone or in any combination, teach or fairly suggest at least the above-noted features as claimed by Applicants. In view of the above, Applicants respectfully request that the rejection be reconsidered and withdrawn.

The rejection of claims 5, 6, 9 and 10 under 35 U.S.C. 103(a) as being unpatentable over Kuno in view of Wu and further in view of U.S. Patent App. Pub. No. 2004/0157638 to Moran, et al. (hereinafter "Moran") is hereby traversed and reconsideration is respectfully requested in view of the amendments to the claims contained herein.

The features of independent claims 1 and 7, as amended herein, are discussed above in connection with Kuno and Wu. Claims 5, 6 and 9 depend therefrom.

Independent claim 10, as amended herein, recites an external display system for mobile communication terminal including a mobile communication terminal. An external display device displays images based on image signals output from said mobile communication terminal. An image output means for outputs image signals for displaying screen images corresponding to contents of an application program executed by an application program execution means, to said external display device. The mobile communication terminal includes the application program execution means for executing the application program with detection result data acquired based on detection results by detection means for detecting at least one of position, direction, attitude and movement, in a main body of said mobile communication terminal, and an external apparatus for mobile communication terminal. The external apparatus includes the detection means for detecting at least one of position, direction, attitude and movement of said external apparatus along at least one axis of a coordinate system; and data transmission means for transmitting detection result data acquired based on detection results by said detection means to said mobile communication terminal by wired or wireless non-public short-range communication. The mobile communication terminal further includes data reception means for receiving detection result data transmitted from said external apparatus for mobile communication terminal by wired or wireless non-public short-range communication, in the main body of said mobile communication terminal, wherein the application program execution means executes said application program with detection result data received by said data reception means. Claims 11-13 and 17 depend directly or indirectly from independent claim 10.

The Moran reference discloses a multi-access solid state memory device and telephone utilizing such. The Office Action cites to Moran as disclosing an external host system connected

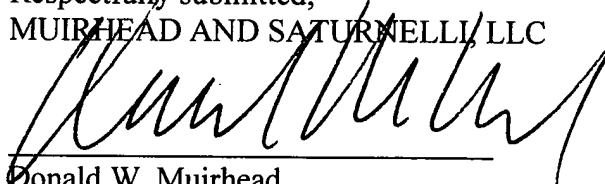
to a cellular telephone via a USB connection with the host system and a flash memory system of the cellular phone, citing specifically to Figure 1, item 110 and page 5, paragraph 112 of Moran.

Applicants respectfully submit that Moran does not overcome the above-noted deficiencies of the Kuno and Wu references with respect to Applicants' presently-claimed invention. Specifically, Moran is silent as to issues of detecting movement and/or orientation of a mobile phone. Accordingly, Applicants respectfully submit that neither Kuno, Wu nor Moran, taken alone or in any combination, teach or fairly suggest at least the above-noted features as claimed by Applicants.

Further, Applicants have added new claims 11-25 and, in view of the above-noted remarks, respectfully submit that these claims are patentable over the cited prior art.

Based on the above, Applicants respectfully request that the Examiner reconsider and withdraw all outstanding rejections and objections. Favorable consideration and allowance are earnestly solicited. Should there be any questions after reviewing this paper, the Examiner is invited to contact the undersigned at 508-898-8603.

Respectfully submitted,  
MUIRHEAD AND SATURNELLI LLC

A handwritten signature in black ink, appearing to read 'Donald W. Muirhead', is written over a horizontal line.

Donald W. Muirhead  
Registration No. 33,978

Date: August 27, 2008

Muirhead and Saturnelli, LLC  
200 Friberg Parkway, Suite 1001  
Westborough, MA 01581  
Phone: (508) 898-8601  
Fax: (508) 898-8602